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December 16, 2022

Via ECF

Hon. Judge Joanna Seybert
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

RE: Ruland v. Nassau County et. al.
Docket No. 22-CV-00531 (JS)(JMW)
Opposition to Defendants' Letter Motion to Dismiss

Dear Honorable Judge Seybert:

I write to respectfully request an extension of time to provide the discovery status on this matter and or extend the discovery deadlines in this matter. Due to an unexpectedly heavy trial schedule Mr. Reissman, Counsel for Nassau County, has been unable to gather the discovery I, as plaintiff's counsel, listed in our joint Rule 26 (f) Scheduling Order as required before EBTs could go forward (see Docket Number 12). Mr. Reissman and I have consulted and determined that an additional 30 days would allow substantial paper discovery to take place so that EBTs can commence. It would appear that EBTs will not conclude as scheduled so a request for extension of that deadline is also necessary. Counsel remain at the Court's disposal should the Court require additional information.

The Plaintiff and I remain grateful to the Court for its time and attention to this matter.

Respectfully yours,

Electronically signed

JEFFREY B. MELCER
jbm

cc: (Via ECF) Ralph J. Reissman, Esq. - Attorney For Defendants